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May 14, 2025

REQUEST TO BE FILED UNDER SEAL

The Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

RE: United States v. Vladimir Antonio Arevalo-Chavez
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

In response to the government's request to file certain documents under seal we ask the Court to consider the following:

First, we ask that the Court not file a document (Exhibit B) that is written in Spanish and has not been translated. We do not see how the government can ask the court to render a decision while a substantial portion of the submitted documents have yet to be translated.

Second, we note that while the dismissal request is not opposed, there is other relief that we have requested, including that the dismissal be made with prejudice and that the entry of, or effective date of, the dismissal be delayed by a few days so that we can file a writ of habeas corpus in an effort to make sure our client's rights under the Convention and Against Torture and U.S. immigration laws be afforded to him after the dismissal becomes effective.

Third, we ask for an opportunity, after the document is translated, to submit a brief additional argument regarding our requests for relief with respect to the motion, noting, for example, that it appears from Exhibit C (which has been

translated) that our client was tried in absentia, without notice to him to appear or defend himself, and that he was convicted and sentenced to prison on or about January 11, 2020. This is another instance of what may be “bad faith” on the part of the government because they stated that the reason for moving to dismiss the indictment is so that our client “can be tried” in El Salvador before being tried in the United States. He now seems to have already been tried and sentenced in El Salvador. This apparent bad faith should go into the Court’s calculus of whether the indictment should be dismissed with prejudice.

We thank the Court for Your Honor’s consideration of these points.

Sincerely,

/s/ Louis M. Freeman
Louis M. Freeman

/s/ Thomas H. Nooter
Thomas H. Nooter
Attorneys for Defendant Averalo-Chavez

cc: Justina Geraci, by email